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March 28, 2018

United States District Court
Eastern District of New York
225 Cadman Plaza E.
Brooklyn, NY 11201
Attention: Honorable Roanne L. Mann

Re: Brown v. St. Kitts Marriott Resort and the Royal Beach Casino et al.,
Docket No.: 1:14-cv-05960-NG-RLM
Our File No.: 4295

Dear Honorable Mann:

Please accept this joint letter on behalf of all parties to this action. We write to respectfully request an extension of your Honor's discovery Order.

Our firm was retained in this matter and filed a Notice of Appearance on February 14, 2018, substituting prior counsel. At that time, no discovery had been exchanged with defense counsel. Since that time, Plaintiff has served Rule 26 Disclosures, and provided defense counsel with all medical records and all requested authorizations. Plaintiff's deposition was held and completed on March 12, 2018. The deposition of non-party eye witness Judith Gomez has been scheduled for April 4, 2018. Defense counsel is working to schedule party witnesses to produce for deposition, which we anticipate will be conducted via video conference as the witnesses mostly reside in St. Kitts. We are doing our best to complete fact discovery as quickly as possible.

We respectfully request the following extended discovery schedule:

- Initial disclosures, including HIPAA authorizations – DONE
- Fact discovery must be completed by May 30, 2018
- Plaintiff's expert disclosures must be served by June 30, 2018
- Defendant's expert disclosures must be served by July 30, 2018



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Please advise whether the above proposed schedule is acceptable to the Court. Please advise when the Court would like the parties to attend any settlement, or other conferences.

Again, we apologize for any previous delays. Counsel for both parties are cooperating and working together in good faith. Since our firm has entered this case on Plaintiff's behalf, the parties have done everything in our power to expedite this process and complete discovery. We await further instruction from the Court. Thank you for your time and attention.

Respectfully Submitted,

David L. Scher

DLS/sps